

AO91 (Rev. 8/01) Criminal Complaint

## UNITED STATES DISTRICT COURT

SOUTHERN

DISTRICT OF

TEXAS

UNITED STATES OF AMERICA

V.

Nancy MEDINA  
 Krystelle Elaine RESENDEZ,  
 Manuel Emeterio MEDELLIN  
 Laredo, TX.  
 US

CRIMINAL COMPLAINT

Case Number: 5:14 mj 1588-1

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(Name and Address of Defendant)

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about December 22, 2014 in Webb County, in the Southern District of Texas Nancy MEDINA and Krystelle Elaine RESENDEZ and Manuel Emeterio MEDELLIN a citizen of the United States, United States and United States, did unlawfully transport Miguel Angel Martinez Robledo, Ever Armando Zavala Cruz, and 10 undocumented alien(s) within the Southern District of Texas knowing or in reckless disregard of the fact that said alien(s) had come to, entered, or remained in the United States in violation of law, and transported or moved said alien(s) within the United States by means of motor vehicle or otherwise, in furtherance of such violation of law;

in violation of Title(s) 8 United States Code, Section(s) 1324

I further state that I am a(n) Border Patrol Agent and that this complaint is based on the following facts: Based on statements of the accused and records of the U.S. Department of Homeland Security.

Continued on Affidavit

United States Magistrate Court  
 JSH - SDTX  
 FILED

DEC 29 2014 2C

David J. Bradley, Clerk  
 Laredo Division

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Xareny Leon /S/  
 Signature of Complainant

Xareny Leon  
 Printed Name of Complainant

Sworn to before me and signed in my presence,

December 29, 2014  
 Date

at

Laredo, Texas  
 City and State

J. Hacker, U.S. Magistrate Judge  
 Name and Title of Judicial Officer

[Signature]  
 Signature of Judicial Officer


CONTINUATION OF CRIMINAL COMPLAINT

**AFFIDAVIT**

In support of Criminal Complaint

**UNITED STATES OF AMERICA**  
**V.**

**CRIMINAL COMPLAINT**

Nancy MEDINA, Krystelle Elaine RESENDEZ, 

**Case Number:**

On December 22, 2014, a Border Patrol Agent (BPA) was working his assigned duties in Laredo, Texas. At approximately 10:20 p.m., Laredo North Cameras observed several subjects loading into an older model Chevrolet Suburban at the corner of Abbeville and Allen Drive. The BPA responded and immediately encountered a vehicle matching the description at the corner of Riverbank and Bristol. The BPA noticed an older man (later identified as MEDELLIN JR, Manuel (DOB: 02/09/1961 POB: US) driving the vehicle, and the rear of the vehicle riding very low. As the BPA turned behind the suburban, he noticed several occupants in the vehicle.

At approximately 10:22 p.m., the BPA activated his emergency lights and siren to perform a traffic stop and immigration inspection of the vehicle (white 2001 Chevrolet Suburban bearing Texas tag BB13892) and its passengers. The vehicle yielded to the emergency equipment at the corner of Bristol and Norwich. After the vehicle came to a complete stop, several subjects exited the vehicle through the rear passenger doors and attempted to run. Other responding Border Patrol Agents apprehended the subjects within the vicinity of the traffic stop. After conducting immigration inspections of the fifteen occupants, it was determined that twelve subjects were illegally present in the United States and three subjects, including the driver, were United States Citizens.

**ADDENDUM:**

Based on interviews conducted by Joint Terrorism Task Force (JTTF), and a Laredo Sector Lead Intel Agent, it was determined that RESENDEZ was the individual who coordinated the events that took place on the date of the incident.

RESENDEZ contacted MEDELLIN and instructed him to pick her up. Once in the vehicle, RESENDEZ instructed MEDELLIN where to go and pick up the illegal immigrants.

**PRINCIPAL:**

RESENDEZ, Krystelle Elaine (DOB: 05/03/1996 POB: US) was read her Miranda Rights, which she acknowledged by signing Service Form I-214. Miranda Rights were read by a BPA. RESENDEZ was willing to make a statement without the presence of an attorney.

On her Sworn Statement, RESENDEZ, Krystelle Elaine stated that she has transported aliens five or six times prior to her arrest on 12/22/2014. She also admitted that she has worked for Noel Ortiz for approximately one year.

**CO-PRINCIPAL:**

MEDELLIN, Manuel Emeterio (DOB: 02/09/1961 POB: US) was read his Miranda Rights, which he acknowledged by signing Service Form I-214. Miranda Rights were read by a BPA. MEDELLIN was willing to make a statement without the presence of an attorney.

MEDELLIN, Manuel Emeterio was convicted on 11/14/2008 for possession of marijuana which yielded a 5 year probation sentence.

On his Sworn Statement, MEDELLIN, Manuel Emeterio stated that he met Krystelle RESENDEZ at Tio's Bar in downtown Laredo, Texas approximately one month ago. According to MEDELLIN, RESENDEZ told him where to pick up the illegal immigrants.

**CO-PRINCIPAL:**

MEDINA, Nancy (DOB: 07/27/1996 POB: US) was read her Miranda Rights, which she acknowledged by signing Service Form

I-214. Miranda Rights were read by a BPA. MEDINA was willing to make a statement without the presence of an attorney.

On her Sworn Statement, MEDINA stated that MEDELLIN was going to pay her \$100 for going with him to pick up illegal immigrants. She also stated that RESENDEZ was going to pay MEDELLIN \$300 for the job.

MATERIAL WITNESS:

MARTINEZ-Robledo, Miguel Angel was scanned using E-3/IAFIS and came back positive with an apprehension from Laredo Sector which resulted in an Expedited Removal back to Mexico. Subject departed the country through Laredo, Texas on 05/30/2014.

Record checks through KAK-940 on MARTINEZ-Robledo were negative for any open wants or warrants.

In MARTINEZ-Robledo's Sworn Statement, he stated that he paid around \$800.00 USD to cross into the United States. MARTINEZ-Robledo stated that he crossed the river on December 22, 2014 and was told to run to a white Chevrolet Suburban that was waiting for him and others that crossed with him. He claimed to remember the driver and pointed to him while being processed. He also pointed out the woman in the red sweater who was sitting in the front seat and the thinner young woman who was sitting in the back seat. He then stated that a short time after he was picked up in the vehicle, the vehicle was stopped by immigration.

MATERIAL WITNESS:

ZAVALA-Cruz, Ever Armando was scanned using E-3/IAFIS and came back positive with one prior Voluntary Return and one Expedited Removal from Laredo Sector Border Patrol. ZAVALA-Cruz departed the United States through Laredo, Texas on 08/24/2014.

Records checks through KAK-940 came back with no open wants or warrants.

In ZAVALA-Cruz' Sworn Statement, he stated that paid \$800.00 to be smuggled into the United States. ZAVALA-Cruz further stated that after they crossed into the U.S., he and several others walked briefly to a vehicle that was waiting for them. He then stated that the driver was an older heavy set man with a light grey shirt (subject described MEDELLIN as the driver of the white Chevrolet Suburban). A short time later, once in the vehicle, ZAVALA-Cruz stated they were stopped by immigration.

DISPOSITION:

RESENDEZ, MEDINA and MEDELLIN will be held at the Laredo North Border Patrol Station pending an appearance before the United States Magistrate Court for 8 USC1324 (Felony) with the use of a motor vehicle.

MARTINEZ-Robledo and ZAVALA-Cruz will be held at the Laredo North Border Patrol Station as a material witness in the case of RESENDEZ, Krystelle Elaine. Upon return from United States Magistrate Court, MARTINEZ-Robledo will be served all forms to effect a Reinstatement for prior order of removal.

The remaining 10 illegal immigrants were turned over to Laredo Sector Processing Center and will be processed accordingly.

The Chevrolet Suburban bearing Texas plates BB1-3892 will be seized.

SUBSCRIBED and SWORN to before me this \_\_\_\_\_ day of \_\_\_\_\_.

\_\_\_\_\_  
Signature of Judicial Officer

\_\_\_\_\_  
Signature of Complaint